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July 20, 2000

Ms. Magalic R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Written Ex Parte Number Resource Optimization – CC Docket Nos. 99-200

Dear Ms. Salas:

On behalf of AT&T, NEXTLINK Communications, SBC, Sprint, Sprint PCS, and Verizon, I am submitting the attached presentation concerning the Commission's rule on reserve numbers. Pursuant to Section 1.1206 of the Commission's rules regarding ex parte communications, please include a copy of this letter and the attached presentation in the public record of the above-captioned proceeding. Please contact the undersigned should you have any questions.

Sincerely,

May Y. Chan

cc: Yog Varma, Deputy Bureau Chief, CCB
 Charles Keller, Chief, Network Services Division, CCB
 Diane Griffin-Harmon, Deputy Chief, Network Services Division, CCB
 Aaron Goldberger, Network Services Division, CCB
 Jeannie Grimes, Network Services Division, CCB
 Sanford Williams, Network Services Division, CCB
 Les Selzer, Network Services Division, CCB
 David Furth, Senior Legal Advisor, WTB
 Blaise Scinto, Deputy Chief, Policy Division, WTB

Reserved Numbers
Joint Ex Parte
in the matter of
Number Resource Optimization

AT&T
NEXTLINK Communications
SBC
Sprint
Sprint PCS
Verizon

Reserved Number Definition

- Reserved Numbers defined as numbers held by service providers at the request of specific end use customers for their use.
- Allowed for “pending” orders
- Limit of 45 days for business and residence
- No extensions
- NANC to review whether a meaningful economic fee structure for reserved numbers could be developed

Reserved Number Rules

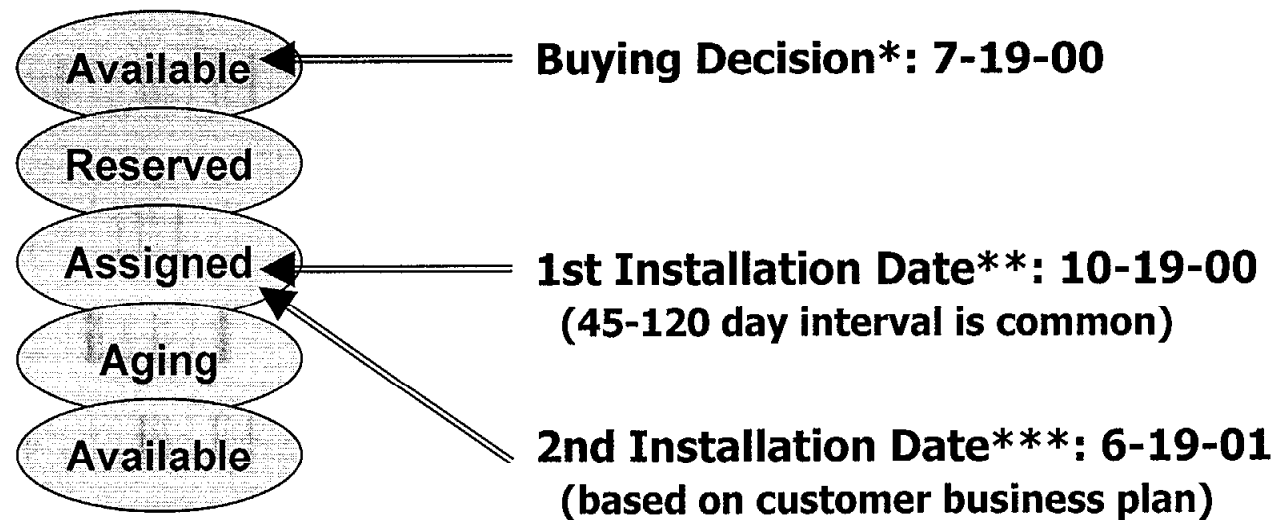
Customer Impacts

- Large Business Planning
 - Centrex Planning / Costs
 - Business Growth
 - Business Relocation
- Vacation Home TNs
- Catastrophe Recovery

Reserved Number Rules

Generic Customer Impact Example

State Government



* Contract for service, plus establishment of future Reservation needs

** Based on later of Customer Desired Date, and Carrier Ready Date

*** Based on future business plan/annual budget and relying on Reserved Numbers

Reserved Number Rules

Unintended Customer Implications

- A new business can learn of its TNs no more than 50 days in advance (5 pending + 45 reserved) which limits the time for:
 - Printing new stationery and other materials
 - Notifying customers and suppliers
- A customer cannot be assigned telephone numbers if the carrier will need more than 50 days to build the necessary facilities
- A business expecting to grow may not reserve additional telephone numbers in the same sequence for more than 45 days.

Reserved Number Rules

Impact Customers When, ...

- A Centrex customer cannot be assured that there will be additional numbers in the future for abbreviated dialing within its system.
- The rules limit a customer's ability to keep a TN after a catastrophe:
 - a house burns down
 - adverse weather phenomena such as hurricanes, ice storms, and tornadoes.
- A seasonal business or a person with a seasonal residence usually wants to be able to keep the same telephone number from year to year

Reserved Number Rules

A Hospital in the Southwest

- A major regional hospital in the southwest.
 - 10,000 working numbers with an additional 8,000+ reserved numbers for future expansion plans.
 - This hospital complex currently makes use of a 5 digit numbering plan and anticipates a continuation of this arrangement using its reserved numbers.
 - The NRO requirement to release all reserved numbers beyond 45 days will severely impact the operation and future plans of this customer.

Reserved Number Rules

A Food Merchant in the Midwest

- A major food industry customer in the Midwest region.
 - recently consolidated numbers working in several NXXs to take advantage of Centrex services as well as a simplified internal dialing plan.
 - Customer also has reserved numbers for future growth within the existing service
 - Elimination of reserved numbers will significantly reduce the value of the customer's decision to consolidate its operations into a single NPA-NXX.

Reserved Number Rules

A Bank Upgrading to Centrex

- A large bank that is converting from “B1” service to Centrex.
 - Individual branches will convert on a schedule over six months to the Centrex numbering scheme.
 - Sequential numbers for the entire project will be needed at the beginning of the project implementation.
 - The 45-day reservation limitation will not provide the numbers needed for this bank customer.

Reserved Number Rules

Hospitals Require Sequential Numbers

- Two large regional hospitals have reserved numbers to fit systems niche.
 - Their technology platforms require sequential numbers to maintain their inter campus four digit dialing plan.
 - If reserved numbers were removed, all growth would have to be served from a different technology or system.
 - FCC 00-104 as ordered would increase costs for this customer and would not allow them to continue their inter campus four digit dialing plan.

Reserved Number Rules

New Schools Must Know New Numbers

- A school district that will construct eleven new schools over the next year.
 - The school has requested DID (Direct Inward Dial) numbers to meet expected demand over the next 12 months.
 - Carrier also serves a city government that has used an entire NXX and has requested to reserve another NXX for future growth.
 - Both governmental agencies will be harmed with the 45-day reservation limitation as ordered in FCC 00-104.

Reserved Number Rules

Directory Listings Drive Number Plans

- Business customers ask that their numbers be listed in the latest directory.
 - In most cases directories are published once a year
 - A business that is moving into an area asks for TNS in time for it to be listed in the directory.
 - A business customer may be building a new building that will not be ready for up to a year, but the business wants its number in the directory when the new directory is issued.
 - With the 45-day reservation limitation business customers may have to wait up to a year until their number is listed in the directory.

For the FCC's Consideration: A Suggested Approach

- Stay the 45-Day Reservation Limitation Aspect of the Order while the FCC Solicits Further Comments on the Stay Petitions